

General



N3B – Los Alamos

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Environmental Management

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Date: JUN 15 2018
Refer To: N3B-18-0136

John Kieling, Bureau Chief
Hazardous Waste Bureau
New Mexico Environment Department
2905 Rodeo Park Drive East, Building 1
Santa Fe, NM 87505-6303

Subject: Notification of Possible Impacts from Stage III Fire Restrictions

Dear Mr. Kieling:

The purpose of this letter is to provide notification to the New Mexico Environment Department (NMED) of potential project/activity impacts resulting from implementation of Stage III Fire Restrictions at Los Alamos National Laboratory (LANL). LANL entered Stage III Fire Restrictions on Friday, June 1st, due to the potential for extreme fire danger. The intent of the restrictions is to eliminate both the potential for a human-caused ignition and the need to rescue personnel from backcountry areas in the event of a wildland fire. In particular, the following projects/activities (including non-Compliance Order on Consent [Consent Order] projects) may potentially be impacted by Stage III Fire Restrictions:

- Drilling of well R-69 for the RDX project,
- Routine surface water sampling (including access to gauge stations)
- Routine groundwater sampling (i.e., Interim Facility-Wide Groundwater Monitoring Plan)
- Sampling, best management practice installation and maintenance, and engineered controls installation and maintenance under the Individual Permit for Storm Water

Safety

Safety is the highest priority for the U.S. Department of Energy (DOE) Office of Environmental Management Los Alamos Field Office (EM-LA) and Newport News Nuclear BWXT – Los Alamos, LLC (N3B). The increasingly severe drought conditions have increased safety-related risks to multiple projects. In addition to the increased fire danger, there is an increased likelihood of red flag days, which will further increase schedule and cost risk to projects. The hazards cannot be fully mitigated, and the potential consequences of a planned or unplanned ignition event are severe, as evidenced by the Cerro Grande fire in 2000 and the Las Conchas fire in 2011. N3B will continue evaluating the safety concerns related to Stage III Fire Restrictions and will notify NMED if environmental and personnel safety measures will impact scheduled performance of compliance activities.



Mitigations


N3B will continue to evaluate and implement measures, as appropriate, to enable execution of planned work activities to the extent that it is safe to do so. This will include vegetation management and use of water trucks to enable access to areas currently limited by Stage 3 restrictions.

Path Forward

N3B will continue evaluating whether its mitigations are successful and sufficient to maintain the current schedule for Consent Order projects and activities in light of the Stage III Fire Restrictions. If N3B's evaluations indicate that the risk to the schedule for the above projects/activities cannot be fully mitigated by the actions identified above, EM-LA and N3B will submit a force majeure notification in accordance with Section XXIII of the Consent Order.

If you have any questions, please contact Frazer Lockhart at (505) 257-8049 (frazer.lockhart@em-la.doe.gov) or David Rhodes at (505) 665-5325 (david.rhodes@em.doe.gov).

Sincerely,



Nick Lombardo
Program Manager
N3B – Los Alamos

Sincerely,



Doug Hintze, Manager
Environmental Management
Los Alamos Field Office

NL/DH/FL/DR:kr

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